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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO, et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' MOTION FOR
ADMINISTRATIVE RELIEF TO EXCEED
PAGE LIMITATION FOR
MEMORANDUM IN SUPPORT OF EX
PARTE MOTION FOR TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE**

Civil Local Rule 7-11

1 Plaintiffs American Federation of Government Employees, AFL-CIO, *et al.* hereby
2 respectfully submit this Motion for Administrative Relief, pursuant to Civil Local Rule 7-11, to
3 exceed the page limitation applicable to Plaintiffs' Memorandum in Support of *Ex Parte* Motion for
4 Temporary Restraining Order and Order to Show Cause, which is being filed today. Plaintiffs seek an
5 additional five (5) pages for their memorandum. Plaintiffs have been unable to reach counsel for
6 Defendants to determine if they will stipulate to the requested relief.

7 In support of their request, Plaintiffs provide the following showing of good cause:

8 1. Plaintiffs' *Ex Parte* Motion for Temporary Restraining Order involves constitutional
9 and statutory claims in a case of national importance, as well as extensive evidence of irreparable
10 harm, the standing of ten different plaintiff organizations, and other factual and equitable issues.

11 2. Plaintiffs have been diligent in drafting their motion and supporting papers, in
12 conformity with the format and content mandated by the Court, and have attempted to shorten the
13 length of the brief as much as possible. Plaintiffs have also been working as swiftly as possible to
14 present these issues to the Court. However, Plaintiffs require an additional five (5) pages in order to
15 fully address the complex factual and legal background for the Court, particularly given the rapidly
16 developing factual circumstances.

17 3. It was not possible to reach Defendants to seek their consent to this motion. The
18 Complaint was filed on the evening of February 19, 2025. In order to provide notice of this action to
19 the Defendants as quickly as possible, on February 20, 2025, Plaintiffs' counsel emailed the
20 complaint and supporting documents to all attorneys who could be identified through PACER at the
21 U.S. Department of Justice who have represented the Office of Personnel Management and Acting
22 OPM Director Charles Ezell in other very recent cases. Declaration of Eileen B. Goldsmith in
23 Support of Plaintiffs' Application for Temporary Restraining Order ¶2. None of the U.S. Department
24 of Justice attorneys contacted have responded since February 20. *Id.* ¶3. Thus, a stipulation to the
25 present motion could not be obtained from opposing counsel. *Id.* ¶5.

26 On the basis of the foregoing showing of good cause, Plaintiffs respectfully request this Court
27 to permit them to file the accompanying Memorandum in support of the *Ex Parte* Motion for
28 Temporary Restraining Order and Order to Show Cause of 30 pages.

1 DATED: February 23, 2025

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